

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Petition of Time Warner Cable for)	
Declaratory Ruling That Competitive)	
Local Exchange Carriers May Obtain)	
Interconnection Under Section 251 of)	WC Docket No. 06-55
the Communications Act of 1934, as)	
Amended, to Provide Wholesale)	
Telecommunications Services to VoIP)	
Providers)	
)	

MOTION FOR EXTENSION OF TIME

Pursuant to Section 1.46 of the Commission's rules, 47 C.F.R. § 1.46, COMPTEL hereby requests that the Commission extend the deadline for all interested parties to file comments in the above-captioned proceeding from March 27, 2006 to April 10, 2006, and to extend the deadline for all interested parties to file reply comments from April 11, 2006 to April 25, 2006. The brief two-week extensions of time will not prejudice any interested parties. Counsel for Petitioner Time Warner Cable ("TWC") has authorized COMPTEL to represent to the Commission that, although TWC continues to urge the Commission to act on its Petition expeditiously, it does not object to a 14 day extension of the comment and reply comment periods. The issues raised by TWC's Petitions are both novel and complex. The additional time is necessary in order for parties to prepare and submit substantive and well reasoned comments that will hopefully help guide the Commission to the correct decision.

On March 1, 2006, TWC filed a Petition For Declaratory Ruling requesting that the Commission confirm that competitive local exchange carriers (CLECs) are entitled to interconnect with incumbent LECs pursuant to Section 251 of the Communications Act of 1934, as amended, for the purpose of providing wholesale telecommunications services to VoIP providers. TWC asserts that at least two state commissions have held that only telecommunications carriers that transmit traffic to or from their own retail end users are entitled to interconnection pursuant to Section 251, thereby foreclosing TWC from introducing competitive VoIP services provided over wholesale telecommunications services obtained from competitive carriers. On March 6, 2006, the Commission issued a Public Notice, DA 06-534, establishing a three week comment period, with reply comments due two weeks later.

The Commission's decision on the TWC Petition could have a significant impact on the future availability of competitive VoIP service as well as a large and diverse group of interested parties, including state regulators, ILECs, CLECs, telecommunications wholesalers, VoIP providers and consumers who wish to receive the benefits of IP-enabled services offered by competitive providers. For this reason, it is critically important that the Commission allow ample time for all interested parties to participate in this proceeding in a meaningful way. TWC has graciously consented to a two week extension and will not be prejudiced thereby. The Commission has previously granted requests for extensions under similar circumstances. *See, e.g., Performance Measurements and Standards for Interstate Special Access Services*, Order, 16 FCC Rcd. 22,117 (2001); *Performance Measurements and Standards for Unbundled Network Elements and Interconnection*, Order, 16 FCC Rcd. 21,428 (2001).

For the foregoing reasons, COMPTTEL respectfully requests that the Commission grant its motion and extend the deadline to file comments in this proceeding to and including April 10, 2006, and the deadline to file reply comments to and including April 25, 2006.

Respectfully submitted,

/s/

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March 15, 2006

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of March, 2006, I caused a true and correct copy of the forgoing Motion for Extension of Time to be served by first-class U.S.

Mail, postage prepaid on the parties listed below:

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/s/

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